

# EXHIBIT A

\$400 MMB

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LONTEX CORPORATION,

Plaintiff,

Civil Action No.

vs.

NIKE, INC.,

Defendant.

**FILED**

DEC 31 2018

KATE BARKMAN, Clerk  
Dep. Clerk

18-5623

**COMPLAINT FOR TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION**

COMES NOW the Plaintiff, Lontex Corporation ("Lontex"), by counsel, and as for its Complaint against the Defendant NIKE, Inc. ("NIKE"), Lontex alleges as follows:

**PRELIMINARY STATEMENT**

1. For decades, Lontex has manufactured and sold athletic apparel, including to the general public, professional sports franchises, and collegiate athletic programs. Lontex developed a strong reputation in the medical and sports fields because its products utilize high percentages of lycra fiber in the west and the warp directions, which compress effectively and are comfortable for consumers. At least as early as June 18, 2007, Lontex launched its successful COOL COMPRESSION line of clothing, including compression shirts, shorts, tights, and socks. Lontex's COOL COMPRESSION brand assures purchasers that the quality and performance of the technology is consistent across the product line.

2. Despite Lontex's success and well-known COOL COMPRESSION athletic apparel and the immense goodwill Lontex has generated in its COOL COMPRESSION mark, Lontex discovered NIKE was selling apparel under the COOL COMPRESSION trademark since as early as October 2015 under the Nike brand. NIKE's line of "Cool Compression" athletic

DEC 31 2018

**Joanne Figaniak**

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**From:** notification@pay.gov  
**Sent:** Wednesday, January 30, 2019 1:46 PM  
**To:** Joanne Figaniak  
**Subject:** Pay.gov Payment Confirmation: PAED CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact PAED ECF Help Desk at 866-ECF-4ECF.

Application Name: PAED CM ECF  
Pay.gov Tracking ID: 26F3J4NS  
Agency Tracking ID: 0313-13318807  
Transaction Type: Sale  
Transaction Date: Jan 30, 2019 1:46:18 PM

Account Holder Name: CHARLES W. ORMSBY  
Transaction Amount: \$40.00  
Card Type: Visa  
Card Number: \*\*\*\*\*0992

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

*Pro Hac admission  
Ben Wagner*

**Joanne Figaniak**

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**From:** notification@pay.gov  
**Sent:** Wednesday, January 30, 2019 1:37 PM  
**To:** Joanne Figaniak  
**Subject:** Pay.gov Payment Confirmation: PAED CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact PAED ECF Help Desk at 866-ECF-4ECF.

Application Name: PAED CM ECF  
Pay.gov Tracking ID: 26F3J36G  
Agency Tracking ID: 0313-13318756  
Transaction Type: Sale  
Transaction Date: Jan 30, 2019 1:36:51 PM

Account Holder Name: CHARLES W. ORMSBY, JR Transaction Amount: \$40.00 Card Type:  
Visa Card Number: \*\*\*\*\*0992

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*Pro Hac Admission  
Andrew Skale*

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

United States Courthouse

601 Market Street, Room 2609

Philadelphia, PA 19106-1797

Kate Barkman  
Clerk of Court

Clerk's Office  
215-597-7704

June 19, 2019

Craig C Crockett Esq  
Troutman Sanders LLP  
580 California St Suite 1100  
San Francisco CA 94014

RE: LONTEX COR V NIKE INC  
Case No. 18-5623

Dear Counselor:

Pursuant to Local Rule of Civil Procedure 83.5.2(b) effective October 1, 2002, a fee of \$40.00 is to be tendered to the Clerk of the District Court at the time of filing an Application to Appear Pro Hac Vice.

FOR OFFICE USE ONLY

Please make your check payable to the Clerk, United States District Court and identify the case number on the check.

Sincerely,

KATE BARKMAN  
Clerk of Court

By: 

Aida Ayala  
Deputy Clerk

cc: Judge MMB  
File

TROUTMAN SANDERS LLP

Vendor No. 50510 - Clerk, United States District Court

Check No.707813

Deliver To:

<u>Inv #</u>	<u>Inv. Date</u>	<u>Description</u>	<u>Gross</u>	<u>Discount</u>	<u>Net</u>
061919	6/19/2019	VENDOR: Clerk, United States District Court INVOICE#: 061919 DATE: 6/19/2019 Filing an Application to Appear Pro Hac Vice Case No. 18-5623	\$40.00		\$40.00
		<b>Totals</b>	<b>\$40.00</b>	<b>-</b>	<b>\$40.00</b>

Wells Fargo, N.A.  
Valdosta, Georgia

## TROUTMAN SANDERS LLP

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No. 707813

64-975/612

Date

06/27/2019

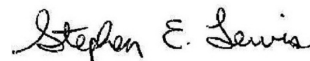
PAY VOID

\$40.00

TWO SIGNATURES REQUIRED OVER \$5000.00

TO THE  
ORDER  
OF

Clerk, United States District Court  
Eastern District of Pennsylvania  
United States Courthouse  
601 Market Street, Room 2609  
Philadelphia, PA 19106-1797



C707813C A061209756A2079900030141C

**Joanne Figaniak**

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**From:** notification@pay.gov  
**Sent:** Wednesday, August 14, 2019 9:56 AM  
**To:** Joanne Figaniak  
**Subject:** Pay.gov Payment Confirmation: PAED CM ECF

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact PAED ECF Help Desk at 866-ECF-4ECF.

Application Name: PAED CM ECF  
Pay.gov Tracking ID: 26JG5QQO  
Agency Tracking ID: 0313-13732864  
Transaction Type: Sale  
Transaction Date: Aug 14, 2019 9:56:13 AM

Account Holder Name: CHARLES W. ORMSBY, JR.  
Transaction Amount: \$40.00  
Card Type: Visa  
Card Number: \*\*\*\*\*0992

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Pro Hac Admission for  
Katherine Harihar